

ALSTON & BIRD LLP

One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424

404-881-7000
Fax: 404-253-8424
www.alston.com

Douglas S. Arnold

Direct Dial: 404-881-7637

Email: Doug.Arnold@alston.com

November 30, 2016

VIA U.S. CERTIFIED MAIL

Mr. Fernando Rivera
Enforcement Project Manager
SECEB
Superfund Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street SW
Atlanta, GA 30303-8909

Re: Burlington Cheraw Superfund Site (Cheraw, South Carolina)
Section 104 / Section 3007 Request for Information

Dear Mr. Rivera:

I am writing to respond to EPA's Information Request dated November 9, 2016 pursuant to Section 104 of CERCLA and Section 3007 of RCRA for the Burlington Cheraw Superfund Site (the "Site") on behalf of BGF Industries, Inc. ("BGF").

Following review of this letter, please feel free to contact me at any time concerning this response.

Sincerely,



Doug S. Arnold

cc: Robby Dunnagan (via email)

QUESTIONS

- 1. Identify the person(s) answering these Questions on behalf of Respondent.**

Alston & Bird LLP
1201 W. Peachtree Street
Atlanta, Georgia 30309
Phone: (404) 881-7637

- 2. For each and every Question contained herein, identify all persons consulted in the preparation of the answer.**

Robby Dunnagan, President
BGF Industries, Inc.
3802 Robert Porcher Way
Greensboro, North Carolina 27410

- 3. For each and every Question contained herein, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the Question and provide true and accurate copies of all such documents.**

No specific documents have been examined in the preparation of these Responses.

- 4. Generally describe Respondent's overall connection to the contamination associated with the Site.**

BGF has no known connection to the contamination associated with the Site.

- 5. Please explain when the property was owned or leased by you and identify the date you took possession and/or ownership of the Site property and the date you surrendered title and/or possession.**

BGF has at no time owned, leased, or otherwise taken possession of the Site property.

- 6. Please identify when you initiated and when you ended business operations and/or related activities at the property.**

BGF has at no time conducted business operations or related activities at the property.

- 7. Were there operating businesses present on the Site property at the time of your purchase or lease of them? Please identify or provide any information**

or documents you may have on any operations that occurred at the Site property.

BGF has at no time owned, leased, or otherwise taken possession of the Site property. BGF is therefore unaware of any operating businesses present on the Site.

- 8. Please describe the environmental condition of the property on or about the date you took possession/title and when you left. Specifically, please explain whether you took possession of the property after the disposal or placement of the hazardous materials on, in, or at the property; further, please provide all relevant facts upon which you base your answer.**

BGF has at no time owned, leased, or otherwise taken possession of the Site property. BGF is therefore unaware of any environmental conditions on the property.

- 9. Please identify and describe any business or other activity that had been located upon the property prior to your ownership or possession of the property, including but not limited to:**
- a. The name of the business or activity,**
 - b. The nature of its operations,**
 - c. The approximate dates of operation, and**
 - d. Any significant modifications that were made to the property with respect to structures, improvements, or land use.**

BGF has at no time owned, leased, or otherwise taken possession of the Site property.

- 10. Identify all businesses or customers that have used the property to dispose, discard, deposit any materials or waste items.**

BGF has no interest in the property and has no knowledge of disposal, discarding or depositing of materials or waste items on the property.

- 11. Please provide a description of your operations at the facility.**

BGF has at no time operated at the facility.

- 12. Please describe the physical characteristics of the Site during your operations, including, but not limited to, surface structures (e.g. buildings, tanks, etc.) and subsurface structures (e.g. piping, sumps, etc.). Include features which were operational, nonoperational, and any features that were removed.**

BGF has at no time operated at the Site and therefore has no knowledge of its physical characteristics.

13. Please identify and provide any maps, drawings, plans or other documentation which would show the location and function of the historical physical characteristics of the Site.

BGF has at no time operated at the Site and does not have in its possession, custody or control any maps, drawings, plans or other documentation regarding the physical characteristics of the Site.

14. Did any soil or groundwater testing occurred on the Site property? If so, what were the results of that testing?

BGF has not conducted any soil or groundwater testing at the Site.

15. Describe any leaks, spills or releases or threats of releases of any kind into the environment of any hazardous materials that have occurred or may occur at or from the Site, including but not limited to:

- a. When such releases occurred or may have occurred,
- b. How the releases occurred or may have occurred,
- c. When hazardous materials were released or may have been released,
- d. What amount of each such hazardous materials was so releases,
- e. Where such releases occurred or may have occurred,
- f. Any and all activities undertaken in response to each such release or threatened release,
- g. Any and all investigations of the circumstances, nature, extent, or location of each such release or threatened release including, the results of any soil, water (ground or surface), or air testing that was undertaken, and
- h. All persons with information relating to subpart a through g of this Question 15.

BGF has at no time operated at the Site and therefore has no knowledge of any leaks, spills or releases at the Site.

16. Did Respondent perform any environmental assessments of Site property prior to acquiring the Site?

BGF at no time acquired the Site and did not perform any environmental assessments of the Site.

17. Please explain your corporate relationship, if any, with TK Holdings, Inc.

BGF has no corporate relationship with TK Holdings, Inc.

18. Please explain your corporate relationship, if any, with Highland Industries, Inc.

BGF has no corporate relationship with Highland Industries, Inc.

19. Identify all persons who may have knowledge, information, or documents about the materials disposed or buried on the property.

BGF is not aware of any persons who may have knowledge, information, or documents regarding any material disposed or buried on the property.

20. Do you have reason to believe that there may be persons able to provide a more detailed or complete response to any Question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

None known.

21. For each and every Question contained herein, if any information or documents responsive to this Information Request are not in your possession, custody, or control, identify the persons from whom such information or documents may be obtained.

None known.

